

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: NOVARTIS AND PAR ANTITRUST LITIGATION THIS DOCUMENT RELATES TO: All End-Payor Actions	Case No. 1:18-cv-04361 (AKH)
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**NOTICE OF END-PAYOR PLAINTIFFS' UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF PROPOSED SETTLEMENT; CERTIFICATION OF
SETTLEMENT CLASS; APPOINTMENT OF CLASS COUNSEL AND CLASS
REPRESENTATIVES; PRELIMINARY APPROVAL OF PLAN OF ALLOCATION;
APPROVAL OF FORM AND MANNER OF NOTICE TO CLASS; APPOINTMENT OF
SETTLEMENT ADMINISTRATOR AND ESCROW AGENT; AND PROPOSED
SCHEDULE FOR FAIRNESS HEARING**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and Declaration of Robin A. van der Meulen, and exhibits attached thereto, End-Payor Plaintiffs' hereby move, unopposed, for (a) Preliminary Approval of Proposed Settlement, (b) Certification of Settlement Class, (c) Appointment of Class Counsel and Class Representatives, (d) Preliminary Approval of Plan of Allocation, (e) Approval of Form and Manner of Notice to Class, (f) Appointment of Settlement Administrator and Escrow Agent, and (g) Proposed Schedule for Fairness Hearing.

A proposed order is appended hereto as Exhibit 1.

Dated: February 22, 2023

Respectfully submitted,

By: /s/ Robin A. van der Meulen
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